



Graves Garrett LLC

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November 22, 2019

VIA ECF

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
Courtroom 17A
500 Pearl Street
New York, New York 10007

**Re: Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, Case No. 18-cv-2185 (JGK)-DCF
Deposition of Guo Wengui**

Dear Judge Freeman:

Defendant/Counterclaimant Strategic Vision US, LLC (“Strategic Vision”) provides this courtesy notice to the Court that the continued deposition of Guo Wengui ordered by the Court has been renoticed for December 4, 2019. The Court will recall having a short discovery conference near the close of business on Friday, November 8, after Guo’s counsel wrote Strategic Vision minutes earlier to state that Guo would not be appearing on Monday, November 11, although the deposition had been long noticed for that date. Guo’s counsel was unwilling to state the nature of Guo’s conflict or to provide replacement dates. On the day originally noticed, however, Guo was present in New York City and made two broadcasts from his own media platform. Although the Court indicated that consideration would be given to an award of costs against Guo, Strategic Vision did not move for costs because it was able to negotiate with the reporter, videographer, and translator for a waiver of fees.

Over the next week and a half, despite repeated requests, including at least one in person at the deposition of a non-party also represented by his counsel, Guo failed to provide replacement dates. Given the diminishing likelihood of receiving a response, and other depositions already scheduled and the holidays, Strategic Vision reluctantly rescheduled Guo’s deposition for December 4, 2019. This Court had indicated during its emergency call with the parties on November 8th that it would allow this deposition to be taken after the November 29, 2019, deadline, and Strategic Vision wanted to inform the Court that it had availed itself of that option.

Further, Guo has produced no other recordings, and has not stated whether they will be produced in advance of (or even at) his deposition. Guo has already reportedly told the print media that he had over 100 hours of recordings of his May 2017 negotiations with Communist officials alone, so we expect some production will be made.



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Because Guo simply will not respond to inquiries on any points regarding his deposition, we may have to return to the Court for relief if Guo produces no other recordings.

Respectfully submitted,

A handwritten signature in black ink that appears to read "Edward D. Greim".

Edward D. Greim
Attorney for Defendant/Counterclaimant